

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
[INSERT] DIVISION**

WILLIAM A. PLAINTIFF,)	
)	
Plaintiff)	
)	
v.)	CIVIL ACTION NO. CV-0__-HS-_____-__
)	
WILLIAM A. DEFENDANT)	
)	
Defendant.)	

**PLAINTIFF'S RESERVATION OF
OBJECTIONS TO DEFENDANT'S DISCOVERY
(INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS)**

Counsel for William A. Plaintiff says that he/she will respond to Defendant's Interrogatories/Request for Production/Requests for Admissions as required under F.R.Civ.P.[insert], but cannot do so completely at this time because he/she need to obtain the requested information from his/her client(s). Pursuant to the Court's Standing Order Re: Pretrial Procedures, counsel reserves the right to promptly file appropriate specific objections to the [insert type of discovery request] based on the material received after receiving and reviewing the information requested from his/her client(s).

1. [**If applicable**] Without waiving the right to file further specific objections, to the extent the Defendant's Interrogatories/Request for Production/Requests for Admissions call for the production of attorney work product and/or information protected by the attorney-client privilege, Plaintiff objects and reserves the right to assert any additional privileges available under the Rules of Civil Procedure as to the requested information, and requests the Court not to construe as a waiver the failure to specifically object to a specific discovery request until counsel knows whether or not there information responsive to that request even exists and whether the information would be subject to such objection(s).

2. [**If applicable**] Plaintiff objects to the number of Interrogatories propounded by Defendant

on the grounds that they exceed the [Insert F.R.Civ.P Rule or Judge HS Standing Order Section #],
together with sub-part(s), limitations set forth therein.

Name

Attorney for William A. Plaintiff

OF COUNSEL:

CERTIFICATE OF SERVICE

I hereby certify that I have, on _____, 20__ served by hand delivery or by first class mail,
postage prepaid, a true copy of the above on counsel for Defendant(s):
